

March 15, 2005

**VIA ELECTRONIC FILING**



Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: **MB Docket No. 03-15**  
**Negotiated Channel Arrangement No. 20050210AWF**  
**Comments of KCTS Television**

Dear Ms. Dortch:

KCTS Television ("KCTS") provides these comments on the referenced Negotiated Channel Arrangement ("NCA"), as specified in the Commission's Public Notice "DTV Channel Election Issues – Proposed Negotiated Channel Election Arrangements and Procedures for Filing Associated Pleadings," released March 1, 2005 (DA 05-519) ("Public Notice").

The Public Notice shows 20 television stations as participants in NCA No. 20050210AWF, including KCTS's noncommercial educational station KCTS-TV in Seattle, Washington. Based on its review of the filings, it appears that KCTS-TV is specified as being a participant in the NCA by the licensee of KGPX(TV), Spokane, Washington.

However, KCTS needs to make clear that it is not a party to an NCA with KGPX or any other station in NCA No. 20050210AWF. KCTS's own channel election for station KCTS specified a channel (Channel 9) that KCTS was entitled to elect without entering into any NCA, and KCTS's own filing did not state that its election was pursuant to an NCA, or specify any alternative channel.

KCTS does not want its own DTV channel election being put "in play" as a result of KGPX unilaterally specifying KCTS's station as a participant in its NCA. This is true regardless whether KGPX is successful in its quest for the right to use DTV Channel 43, as KGPX's use of Channel 43, or not, has no bearing on KCTS's own channel election.

Pursuant to the Public Notice, a copy of this letter is being served by express mail on each of the stations "participating" in the NCA as specified in the Public Notice. In addition, a copy of this letter is being served on FCC staff.

Should any questions arise concerning this matter, kindly the undersigned.

Respectfully submitted,

KCTS TELEVISION

By: WJP MWR

Title: President - CEO

cc (by express mail): Station KGPX  
Station KREM-TV  
Station KXLY-TV  
Station KHQ-TV  
Station KAYU-TV  
Station KSPS-TV  
Station KWSU-TV  
Station KQUP  
Station KLEW-TV  
Station KUID-TV  
Station KCDT  
Station KATU  
Station KGW  
Station KNMT  
Station KOIN  
Station KVEW  
Station KHCV  
Station KWDK  
Station KSKN

cc (by hand delivery): Nazifa Sawez, FCC  
Room 2-A726  
445 12th Street, S.W.  
Washington, D.C. 20554